

CLERK'S DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2014 OCT 22 PM 2: 03

DEPUTY CLERK

1. Alien

3-14CV-3785L

Case No: _____

#2013

PLEASE TAKE NOTICE that defendant **TAKESHA DUNLAP** AND ALL OCCUPANTS hereby removes to this Court the state court action described below.

On October 22, 2014, an action was commenced in the County Court of Law 1, Tarrant County, Texas, entitled BEAULY, LLC vs. TAKESHA DUNLAP AND ALL OCCUPANTS, Defendant, Case number 2014-003863-1

- Page 1

(a) The Amount in Controversy Exceeds the Federal Minimum Jurisdiction Requirements

- i. The subject real property has a current fair market value of \$ 276,500.00 according to the Tarrant Central Appraisal District.
- ii. The amount in controversy is the value of the object of the litigation. See *Leininger v. Leininger*, 05 F.2d 727,729(5th Cir. 1983).

(b) There is Complete Diversity between Defendants and the Plaintiffs

- i. Defendant TAKESHA DUNLAP et al were, at the time of the filing of this action, have been at all times since, and still are individual resident citizens of the State of Texas.
- ii. Plaintiff BEAULY, LLC, was, at the time of the filing of this action, has been at all times since, and still is a national association with main office in Atlanta, Ga. A national bank is a citizen of the state in which its main office, as set forth in its articles of association, is located. See *Wachovia Bank, N.A. v. Schmidt*, 126 S.Ct. 941 (2006). Accordingly BEAULY, LLC, is a Citizen of Atlanta, Ga.
- iii. 28 U.S.C § 1332(a) provides that “the district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between-
 - a. Citizens of different states; ...”
- iv. 28 U.S.C § 1332(a) (1) For purposes of diversity, an individual is a citizen of the state of their domicile, which is the place of their true, fixed, and permanent home and principal establishment, to which they have the intention of returning home whenever they are absent there from. *See Stine v. Moore*, 213 F.2d 446, 448 (5th Cir. 1954).

v. As the Defendant , TAKESHA DUNLAP is a citizen of the State of Texas and the Plaintiff, BEAULY, LLC, is a citizen of Atlanta, Ga. but not Texas, complete diversity of citizenship exists between Plaintiff and Defendants.

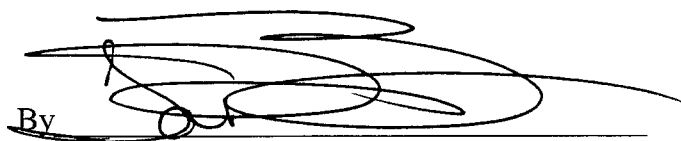
(c) Pursuant the 28 U.S.C. § 1332(a), this court has original jurisdiction over this matter as the amount in controversy meets the federal jurisdiction minimum and there is a complete diversity of citizenship between the Plaintiff and Defendants.

WHEREFORE, defendant TAKESHA DUNLAP pray that this action be removed to the United States District Court For The Northern District of Texas Dallas Division.

Dated: October 22, 2014

Respectfully Submitted,


TAKESHA DUNLAP BELL
705 CHAMPION WAY
MANSFIELD, TEXAS 76063
817-682-1118

By 
TAKESHA DUNLAP BELL (occupant)

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing instrument is being served upon the Attorney, for the Plaintiff via Certified mail, return receipt requested, in accordance with the Federal Rules of Civil Procedure, on this 22nd day of October, 2014 as follows:

BEAULY, LLC
P.O. BOX 13489
ATLANTA, GA 30324
770-609-1065
770-723-0106 FAX



TAKESHA DUNLAP BELL (occupant)

CASE: 2014-003863-1

Beaully, LLC

§

IN THE COUNTY COURT

vs

§

Takesha Dunlap and all occupants

§

AT LAW NO. 1

§

§

TARRANT COUNTY, TEXAS

§

ORDER

(NON-JURY DOCKET)

IT IS ORDERED THAT THE ABOVE-STYLED AND NUMBERED CAUSE IS SET FOR TRIAL, IN ACCORDANCE WITH LOCAL RULE 3.01, IN THE COURTROOM OF TARRANT COUNTY COURT AT LAW NO. 1 ON FRIDAY, OCTOBER 24, 2014 AT 9:00 AM.

SIGNED ON THIS THE 9TH DAY OF OCTOBER, 2014.



JUDGE PRESIDING

LOCATION OF COURTROOM

Old Tarrant County Courthouse
4th Floor-County Court At Law #1
100 W. Weatherford Street, Room 490
Fort Worth Texas 76196-0401
817-884-1457

IN THE EVENT ANY WITNESSES WILL
HAVE ANY DIFFICULTY SPEAKING
OR UNDERSTANDING ENGLISH,
PLEASE MAKE ARRANGEMENTS
FOR AN INTERPRETER.

YOU ARE GOING TO TRIAL
NO FURTHER NOTICE WILL BE GIVEN
PLEASE APPEAR WITH YOUR WITNESSES AT THE
ABOVE STATED DATE AND TIME.

Takesha Dunlap
705 Champion Way
Mansfield TX 76063

CASE No. 2014-003863-1

FILED
TARRANT COUNTY CLERK

2014 AUG -6 PM 12: 21

BEAULY, LLC
Plaintiff:

V.
TAKESHA DUNLAP AND ALL OTHER
OCCUPANTS
Defendant:

§
§
§
§
§
§
§
§
§
§

IN THE COUNTY COURT
MARY LOUISE GARCIA
COUNTY CLERK

AT LAW # 1

BY _____

TARRANT COUNTY, TEXAS

ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES the Defendant, TAKESHA DUNLAP, AND ALL OTHER
OCCUPANTS, and files this Original Answer for the above case and shows:

1. General Denial

Defendant enters a general Denial.

Respectfully Submitted,

TAKESHA DUNLAP BELL
705 CHAMPION WAY
MANSFIELD, TEXAS 76063
817-682-1118

By _____

TAKESHA DUNLAP BELL

CERTIFICATE OF SERVICE

I certify that a true copy of the above was served on the attorney of record or party by
hand delivery, FAX or prepaid first class mail at the last known address in accordance
with Texas Rules of Civil Procedure on August 06, 2014.



TAKESHA DUNLAP BELL

BEAULY, LLC
P.O. BOX 13489
ATLANTA, GA 30324
770-609-1065
770-723-0106 FAX

FILED
2014 JUL 11 PM 3:20

Cause Number: JP07-14-E00074996

BEAULY LLC
PLAINTIFF

IN THE JUSTICE COURT

VS

PRECINCT 7

TAKESHA DUNLAP AND ALL OCCUPANTS
DEFENDANT

TARRANT COUNTY, TEXAS

PAUPER'S AFFIDAVIT FOR APPEAL BOND

BEFORE ME, the undersigned authority, on this day personally appeared TAKESHA DUNLAP AND ALL OCCUPANTS, Plaintiff/Defendant in the above-styled and numbered cause, and as appellant, desires to appeal to the County Court of Tarrant County, Texas; and being by me duly sworn, on oath states that, on the 8th day of JULY, 2014, in the above-styled and numbered cause, before TOM CORBIN, the Justice of the Peace of Precinct 7, Tarrant County, Texas, BEAULY LLC, Plaintiff/Defendant, appellee, recovered judgment against TAKESHA DUNLAP AND ALL OCCUPANTS, appellant, for the sum of \$ 0.00, plus costs of suit, and that appellant is unable to pay the costs of appeal or any part thereof, or to give security thereof or any part thereof.

APPELLANT INFORMATION:

I am (check one) Married x Single Divorced

Number and ages of dependants and where do they reside:

Samonta Dunlap (18) & Seonta Dunlap (12) 705 Champion Way Mansfield, Tx 76063

Employed by: Unemployment

Address of Employer: Ft Worth, Tx

My earnings are: \$ N/A per week, \$ 900.00 per month

I have other income as follows including any governmental entitlement income (state source and amount): N/A

Amount of Monthly Court Ordered Support \$ N/A

I OWN THE FOLLOWING PROPERTY:

HOME (Address): N/A
 Monthly payment: \$ 400 Balance Owed: \$ 10,245
 List Car/Truck Owned: 2006 Infiniti G35
 Monthly payment: \$ N/A Balance Owed: \$ N/A
 Other Land, Buildings, etc. Owned: N/A
 Notes, Mortgages, Trust Deeds: N/A
 Monthly payment: \$ _____ Balance Owed: \$ _____
 Other Vehicles or Mobile Homes: _____

Savings Bonds (Present Value) \$ N/A
 Stocks & Bonds (Description, Value) \$ N/A

I have the following money:

A. In Jail	\$ <u>N/A</u>	E. In Safety deposit box	\$ <u>N/A</u>
B. At Home	\$ <u>N/A</u>	F. Being Held/Owed to Me	\$ <u>N/A</u>
C. In Checking		G. Other	\$ <u>N/A</u>
Accounts	\$ <u>N/A</u>		
D. In Savings			
Accounts	\$ <u>N/A</u>		

INFORMATION ON SPOUSE:

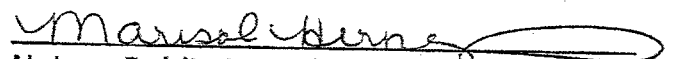
Name: N/A
 Employed by: _____
 Address of Employer: _____
 His/Her Earnings are: \$ _____ per week \$ _____ per month

I AM UNABLE TO PAY THE COSTS OF APPEAL OR FILE AN APPEAL BOND. I
 VERIFY THAT THE STATEMENTS MADE IN THIS AFFIDAVIT ARE TRUE AND
 CORRECT.


 Signature of Appellant

SUBSCRIBED AND SWORN TO BEFORE ME this 11th day of July, 2014.




 Notary Public in and for the State of Texas/
 Clerk of the Justice Court

Approved this _____ day of _____, 20____.

 A Justice of the Peace in and for Precinct 7
 Tarrant County, Texas

Mary Louise Garcia
Tarrant County Clerk
100 W. Weatherford St.
Ft. Worth, Texas 76196-0401

July 29, 2014

Takesha Dunlap and all occupants
705 Champion Way
Mansfield TX 76063

RE: J. P. Appeal, Pct. 7, Cause No.: E74996
A Forcible Detainer

Beaully, LLC vs Takesha Dunlap and all occupants
County Court at Law Case No. 2014-003863-1, Filed 07/29/2014

Dear Sir or Madam,

The above case has been appealed from the Justice of the Peace Court to the County Court at Law No. 1. All pleadings are required by law to be in writing. (Rule 45, TRCP) The style of the case does not change when it is appealed to County Court at Law.

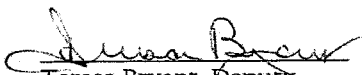
This case is an appeal from an eviction proceeding (Forcible Entry and Detainer). A WRITTEN ANSWER (a formal written statement made by the defendant stating his defense) must be filed within eight (8) full days from the date the appeal was filed in this court as indicated above. If the defendant does not file a written answer with this court within eight days, the allegations of the complaint may be taken as admitted and a judgment by default may be entered accordingly. (Rule 510.12, TRCP)

Cases in County Courts at Law are not automatically set for trial by the court. Either party may set the case for trial in writing. Upon requesting a setting you must forward a copy of your request to the other side. A ten (10) day notice to the other side is required when you request a trial setting.

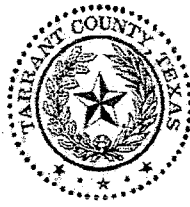
- a.) Individuals can represent themselves, but may not be represented by any agent other than a licensed attorney.
- b.) Corporations shall be represented by a licensed attorney.
- c.) A general partnership shall be represented by at least one of the general partners or a licensed attorney.
- d.) A limited partnership shall be represented by a general, not a limited, partner or a licensed attorney.

Please keep the above County Court at Law case number and refer to it when inquiring. For information regarding a court setting call the Court Coordinator at (817) 884-2761. For all other information call the Court clerks at (817) 884-1485 or (817) 212-7074

Mary Louise Garcia, Clerk
County Courts at Law of
Tarrant County, Texas


Teresa Bryant, Deputy

cc: Beaully, LLC
PO Box 13489
Atlanta GA 30324



TARRANT COUNTY

FORT WORTH, TEXAS 76196-0240

DON PIERSON

JUDGE

COUNTY COURT AT LAW No. 1

817/884-1457

TRACY WOOD

COURT COORDINATOR

817/884-2761

July 29, 2014

Takesha Dunlap and all occupants
705 Champion Way
Mansfield TX 76063

RE: 2014-003863-1

Beaully, LLC vs Takesha Dunlap and all occupants

Dear Sir or Madam,

The above case has been appealed from the Justice of the Peace Court to County Court at Law No. 1 on a PAUPER'S AFFIDAVIT. Pursuant to Section 25.0020 of the Texas Government Code, if your appeal as a pauper is perfected, you may request a pro bono ("free") attorney to represent you in this case.

While this court may appoint any qualified attorney who is willing to provide services for free, at this time, the only pro bono legal services program in Tarrant County is **Legal Aid of NorthWest Texas**. If you wish to request a free attorney for you in this matter, please contact by phone or in person **Legal Aid of NorthWest Texas** at the following:

Vivian Quesada
Legal Aid of NorthWest Texas
600 E. Weatherford St.
Fort Worth, Texas 76102

(817) 336-3957, Ext. 5017

(817) 877-0804 (Fax)

Legal Aid of NorthWest Texas has limited resources, and can only accommodate a small percentage of the requests it receives. If you desire such an attorney, you must make a request immediately. Please Note: The delay or denial of your request will not delay the trial. If Ms. Quesada does not answer the phone, please leave a message and someone from her office will call you back the same day.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Pierson". The signature is fluid and cursive, with the first name "Don" and last name "Pierson" clearly distinguishable.

Don Pierson

cc: Beaully, LLC

CASE #JP07-14-E00074996
IN THE JUSTICE COURT
PRECINCT SEVEN
TARRANT COUNTY, TEXAS

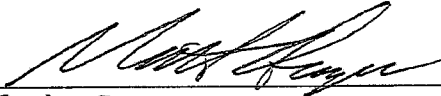
BEAULY LLC
VS
TAKESHA DUNLAP
AND ALL OCCUPANTS

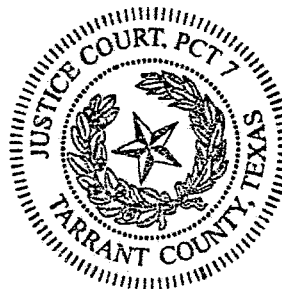
J U D G M E N T

On the 8th day of July, 2014 came to be heard the above numbered and entitled cause, and the Plaintiff(s), attorney, and announced ready for trial, and the Defendant(s), after being duly cited to appear and properly notified of the trial did not appear but wholly made default, and it appearing to the Court upon good and sufficient evidence that Plaintiff(s) is entitled to recover Judgment.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that Plaintiff(s), Beaully Llc, do have and recover of the Defendant(s), Takesha Dunlap and all occupants, possession of the following described premises situated in Justice Precinct Seven, Tarrant County, Texas, To Wit: 705 Champion Way Mansfield Tx 76063 and that a Writ of Possession issue to the proper officer commanding him to seize possession of the said above described premises and deliver same to said Plaintiff(s) if Defendant(s) fails to vacate by July 14, 2014 and further that execution issue for collection of all monies due to the Plaintiff(s).

SIGNED THIS 8TH DAY OF JULY, 2014.


Justice of the Peace
Precinct Seven
Tarrant County, Texas





Matt Hayes
Justice of the Peace, Precinct Seven
1100 East Broad Street Suite 202
Mansfield Texas 76063
817-473-5101
817-850-2328 Fax

July 08, 2014

Takesha Dunlap
705 Champion Way
Mansfield Tx 76063

Re: Case No. JP07-14-E00074996
Beaully Llc vs Takesha Dunlap

Dear Sir/Madam:

In compliance with the Texas Rules of Civil Procedure, you are hereby notified that a Default Judgment has been rendered against you on this date in the above numbered and styled cause.

If you have any questions regarding this matter, please call 817-473-5101.

Respectfully,

Justice Court Clerk
Justice of the Peace, Precinct Seven
Tarrant County, Texas

*****MUST VACATE PREMISES BY MIDNIGHT ON 07/14/2014*****

CONSTABLE'S RETURN

CAME TO HAND ON THE _____ DAY OF _____ A.D. 20____, AT _____
O'CLOCK, _____.M. AND EXECUTED ON THE _____ DAY OF _____, 20____, AT _____
O'CLOCK, _____.M. BY DELIVERING TO _____

DEFENDANT, OR DEFENDANTS, IN PERSON A TRUE COPY OF THIS CITATION _____

NOT SERVED AS TO THE FOLLOWING NAMED DEFENDANT(S) FOR THE REASONS SET OPPOSITE NAME.

FEES - SERVING..... \$ _____
COP. \$ _____
TOTAL..... \$ _____

* CONSTABLE, PCT. NO. _____
TARRANT COUNTY, TEXAS

BY DEPUTY _____

*STRIKE IF NOT APPLICABLE

***** ORIGINAL CITATION IN EVICTION *****

IN THE JUSTICE COURT
MATT HAYES
JUSTICE OF THE PEACE, PRECINCT SEVEN
1100 EAST BROAD STREET SUITE 202
MANSFIELD TEXAS 76063

ISSUED: JUNE 20, 2014

817-473-5101
FAX 817-850-2328

CASE NO. JP07-14-E00074996

PLAINTIFF(S):
BEAULY LLC

PO BOX 13489
ATLANTA GA 30324

HOME: 770-609-1065, FAX: 770-723-0106

ATTORNEY(S) FOR PLAINTIFF(S):

NO SHORTS
DEFENDANT(S): ~~ALLOWED IN COURTROOM~~
TAKESHA DUNLAP

VS.

705 CHAMPION WAY
MANSFIELD TX 76063

DEFENDANT'S
COPY

AND ALL OCCUPANTS
ATTORNEY(S) FOR DEFENDANT(S):

C07 COURT DATE JULY 08, 2014 AT 8:30 AM

DEL
RCUD
CONSTABLE per 7
CUD C. BURESS

SWORN COMPLAINT FOR EVICTION

CASE NO. E00074996☐ With suit for RentCourt Date: 7/8/14 @ 8:30 AMIn the Justice Court, Precinct 7 Tarrant County, TexasPLAINTIFF: BEAULY LLC

(Landlord/Owner Name)

Rental Subsidy (if any) \$ _____

Tenant's Portion \$ _____

TOTAL MONTHLY RENT \$ _____

The amt. of rent per day is \$ _____

VS.

DEFENDANT(S): TAKESHA DUNLAP AND ALL OTHER OCCUPANTS

COMPLAINT: Plaintiff (Landlord) hereby complains of the defendant(s) named above for eviction of plaintiff's premises (including storerooms and parking areas) located in the above precinct. Address of the property is:

705 CHAMPION WAYMANSFIELDTX76063

Street Address

Unit No. (if any)

City

State

Zip

1. **SERVICE OF CITATION:** Service is requested on defendants by personal service at home or work or by alternative service as allowed by the Texas Justice Court Rules of Court. Other service of papers address/addresses (if know) are:

2. ☐ **UNPAID RENT AS GROUNDS FOR EVICTION:** Defendant(s) failed to pay rent for the following time period(s):

TOTAL DELINQUENT RENT AS OF DATE OF FILING IS: \$ _____

Plaintiff reserves the right to orally amend the amount at trial to include rent due from the date of filing through the date of trial.

3. ☒ **OTHER GROUNDS FOR EVICTION/LEASE VIOLATIONS:** Lease Violations (if other than non-paid rent – list lease violations) TENANT IS HOLDING OVER AFTER FORECLOSURE

4. ☒ **HOLDOVER AS GROUNDS FOR EVICTION:** Defendant(s) are unlawfully holding over since they failed to vacate at the end of the rental term or renewal of extension period, which was the _____ day of _____ and delivered by this method: _____

5. **NOTICE TO VACATE:** Plaintiff has given defendant(s) a written notice to vacate (according to Chapter 24.005 of the Texas Property Code) and demand for possession. Such notice was delivered on the 4 day of JUNE and delivered by this method: SENT VIA MAIL

6. **ATTORNEY'S FEES:** Plaintiff will be ☐ or will NOT be ☐ seeking applicable attorney's fees. Attorney's name address phone & fax numbers are _____

7. ☐ **BOND FOR POSSESSION:** If plaintiff had filed a bond for possession, plaintiff request (1) that the amount of plaintiff's bond and defendant's counter bond be set, (2) that plaintiff's bond be approved by the Court, and (3) that proper notice as required by the Texas Justice Court Rules are given to Defendant(s).

REQUEST FOR JUDGMENT: Plaintiff rays that defendant(s) be served with citation and that plaintiff have judgment against defendant(s) for: possession of premises, including removal of defendants and defendants' possessions from the premises, unpaid rent IF set forth above, attorney's fees, court cost, and interest on the above sums at the rate stated in the rental contract, or if not so stated. At the statutory rate for judgments under Civil Statutes Article 5069-1.05.

☒ I give my consent for the answer and any other motions or pleadings to be sent to my e-mail address which is: rashida@csslive.com

RASHIDA FORBES

Petitioner's Printed Name

DEFENDANT(S) INFORMATION (if known):

DATE OF BIRTH: N/A*LAST 3 NUMBERS OF DRIVER LICENSE: N/A*LAST 3 NUMBERS OF SOCIAL SECURITY: N/ADEFENDANT'S PHONE NUMBER: N/ASworn to and subscribed before me this 12/11 day of NOVEMBER 2014Signature of Plaintiff (Landlord/Property Owner) or Agent
Rashida Forbes
P.O BOX 13489Address of Plaintiff (Landlord/ Property Owner) or Agent
ATLANTA GA 30324

City State Zip

770-609-1065 (phone) 770-723-0106 (fax)

Phone & Fax No. of Plaintiff (Landlord/Property Owner) or agent

CLERK OF THE JUSTICE COURT OR NOTARY

AFFIDAVIT

SERVICEMEMBERS CIVIL RELIEF ACT SEC. 201 (b)

***To VERIFY Military Status go to website:** <http://www.dmdc.osd.mil/appj/scra/scraHome.do>

PLAINTIFF BEING DULY SWORN ON HIS OATH DEPOSES AND SAYS UNDER PENALTY OF PERJURY THAT
DEFENDANT: (Please select ONE for DEFENDANT)

 IS IN THE MILITARY SERVICE AND ON ACTIVE DUTY IN A FOREIGN COUNTRY

OR

 IS IN THE MILITARY SERVICE AND NOT ON ACTIVE DUTY IN A FOREIGN COUNTRY

☒ OR

IS NOT IN THE MILITARY SERVICE

*(In addition to this affidavit you MUST provide proof of military status before a default judgment can be rendered).

OR

HAS WAIVED HIS RIGHTS UNDER THE SERVICE MEMBERS RELIEF ACT OF 2003

OR

PLAINTIFF IS UNABLE TO DETERMINE WHETHER OR NOT DEFENDANT IS IN MILITARY SERVICE
*(In addition to this affidavit you MUST provide proof of military status before a default judgment can be rendered).

*I am not providing proof of military status from the governmental web site because

Sign
Here

Rudolph Fink
SIGNATURE OF PLAINTIFF/ AGENT/ ATTORNEY FOR PLAINTIFF

SUBSCRIBED AND SWORN TO BEFORE ME THIS 12th DAY OF SEPTEMBER, 2014

CLERK OF THE JUSTICE COURT'S
NOTARY PUBLIC IN AND FOR STATE OF TEXAS (STRIKE ONE)
NOTARY PUBLIC
COMMISSION EXPIRES
APRIL 2015
TARRANT COUNTY TEXAS

Penalty for making or using false affidavit - A person who makes or uses an affidavit knowing to be false, shall be fined, as provided in title 18 United States Code, or imprisoned for not more than one year, or both.

****CERTIFICATE OF LAST KNOWN ADDRESS****

In strict compliance with Rule 239a, Texas Rules of Civil Procedure, it is hereby certified that the last known mailing address of Defendant is as follows:

****DEFENDANT'S ADDRESS**

CITY, STATE AND ZIP CODE

Sign
Here

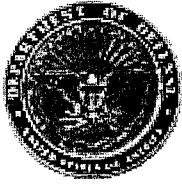
SIGNATURE OF PLAINTIFF/ AGENT/ ATTORNEY FOR PLAINTIFF

FILED
2014 JUN 19 PM 4:2
JUSTICE OF THE PEACE
TARRANT COUNTY TEXAS

Department of Defense Manpower Data Center

Results as of : Jun-16-2014 07:46:54 AM

SCRA 3.0



Status Report Pursuant to Servicemembers Civil Relief Act

Last Name: DUNLOPFirst Name: TAKESHA

Middle Name:

Active Duty Status As Of: Jun-16-2014

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA

This response reflects the individuals' active duty status based on the Active Duty Status Date

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA

This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA

This response reflects whether the individual or his/her unit has received early notification to report for active duty

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty. HOWEVER, WITHOUT A SOCIAL SECURITY NUMBER, THE DEPARTMENT OF DEFENSE MANPOWER DATA CENTER CANNOT AUTHORITATIVELY ASSERT THAT THIS IS THE SAME INDIVIDUAL THAT YOUR QUERY REFERS TO. NAME AND DATE OF BIRTH ALONE DO NOT UNIQUELY IDENTIFY AN INDIVIDUAL.

Mary M. Snavelly-Dixon

Mary M. Snavelly-Dixon, Director
Department of Defense - Manpower Data Center
4800 Mark Center Drive, Suite 04E25
Arlington, VA 22350

FILED BY _____
2014 JUN 19 PM 1:42
JUSTICE OF THE PEACE
PRECINCT SEVEN
TARRANT COUNTY TEXAS

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense (DoD) that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The DoD strongly supports the enforcement of the Servicemembers Civil Relief Act (50 USC App. § 501 et seq, as amended) (SCRA) (formerly known as the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced only a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual was on active duty for the active duty status date, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's status by contacting that person's Service via the "defenseink.mil" URL: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>. If you have evidence the person was on active duty for the active duty status date and you fail to obtain this additional Service verification, punitive provisions of the SCRA may be invoked against you. See 50 USC App. § 521(c).

This response reflects the following information: (1) The individual's Active Duty status on the Active Duty Status Date (2) Whether the individual left Active Duty status within 367 days preceding the Active Duty Status Date (3) Whether the individual or his/her unit received early notification to report for active duty on the Active Duty Status Date.

More information on "Active Duty Status"

Active duty status as reported in this certificate is defined in accordance with 10 USC § 101(d) (1). Prior to 2010 only some of the active duty periods less than 30 consecutive days in length were available. In the case of a member of the National Guard, this includes service under a call to active service authorized by the President or the Secretary of Defense under 32 USC § 502(f) for purposes of responding to a national emergency declared by the President and supported by Federal funds. All Active Guard Reserve (AGR) members must be assigned against an authorized mobilization position in the unit they support. This includes Navy Training and Administration of the Reserves (TARs), Marine Corps Active Reserve (ARs) and Coast Guard Reserve Program Administrator (RPAs). Active Duty status also applies to a Uniformed Service member who is an active duty commissioned officer of the U.S. Public Health Service or the National Oceanic and Atmospheric Administration (NOAA Commissioned Corps).

Coverage Under the SCRA is Broader in Some Cases

Coverage under the SCRA is broader in some cases and includes some categories of persons on active duty for purposes of the SCRA who would not be reported as on Active Duty under this certificate. SCRA protections are for Title 10 and Title 14 active duty records for all the Uniformed Services periods. Title 32 periods of Active Duty are not covered by SCRA, as defined in accordance with 10 USC § 101(d)(1).

Many times orders are amended to extend the period of active duty, which would extend SCRA protections. Persons seeking to rely on this website certification should check to make sure the orders on which SCRA protections are based have not been amended to extend the inclusive dates of service. Furthermore, some protections of the SCRA may extend to persons who have received orders to report for active duty or to be inducted, but who have not actually begun active duty or actually reported for induction. The Last Date on Active Duty entry is important because a number of protections of the SCRA extend beyond the last dates of active duty.

Those who could rely on this certificate are urged to seek qualified legal counsel to ensure that all rights guaranteed to Service members under the SCRA are protected.

WARNING: This certificate was provided based on a last name, SSN/date of birth, and active duty status date provided by the requester. Providing erroneous information will cause an erroneous certificate to be provided.

Certificate ID: HA3BSA59R0C6L40

FILED BY _____
2014 JUN 19 PM 1:42
JUSTICE OF THE PEACE
PRECINCT SEVEN
TARRANT COUNTY, TEXAS

JUSTICE COURT CASE INFORMATION SHEET (4/13)

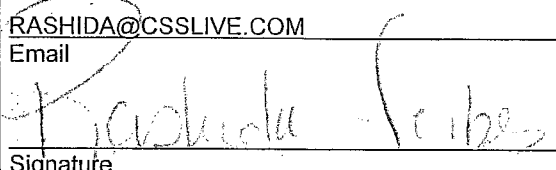
CAUSE NUMBER (FOR CLERK USE ONLY):

E-71996

STYLED: BEAULY LLC vs TAKESHA DUNLAP AND ALL OTHER OCCUPANTS

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition is filed to initiate a new suit. The information should be the best available at the time of filing. This sheet, required by Rule of Civil Procedure 502, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

1. Contact information for person completing case Information sheet RASHIDA FORBES Name 770-609-1065 Phone No. P.O. BOX 13489 Address 770-723-0106 Fax No. ATLANTA, GA 30324 City / State / Zip State Bar No. RASHIDA@CSSLIVE.COM Email  Signature	2. Names of parties in case Plaintiff(s) BEAULY LLC Defendant(s) TAKESHA DUNLAP AND ALL OTHER OCCUPANTS [Attach additional page if necessary to list all parties]
3. Indicate case type, or identify the most important issue in the case (select only one)	
<input type="checkbox"/> Debt Claim: A debt claim case is a lawsuit brought to recover a debt by an assignee of a claim, a debt collector or collection agency, a financial institution, or a person or entity primarily engaged in the business of lending money at interest. The claim can be for no more than \$10,000, excluding statutory interest and court costs, but including attorney fees, if any.	<input checked="" type="checkbox"/> Eviction: An eviction case is a lawsuit brought to recover possession of real property, often by a landlord against a tenant. A claim for rent may be joined with an eviction case if the amount of rent due and unpaid is not more than \$10,000, excluding statutory interest and court costs, but including attorney fees, if any. AFTER FORECLOSURE
<input type="checkbox"/> Repair and Remedy: A repair and remedy case is a lawsuit by a residential tenant under Chapter 92, Subchapter B of the Texas Property Code to enforce the landlord's duty to repair and remedy a condition materially affecting the physical health or safety of an ordinary tenant. The relief sought can be for no more than \$10,000, excluding statutory interest and court costs, but including attorney fees, if any.	<input type="checkbox"/> Small Claims: A small claim case is a lawsuit brought for the recovery of money damages, civil penalties, personal property, or other relief allowed by law. The claim can be for no more than \$10,000, excluding statutory interest and court costs, but including attorney fees, if any.

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2014 JUN 19 PM 1:42
JUSTICE OF THE PEACE
PRECINCT SEVEN
TARRANT COUNTY, TEXAS



Capital Property Management, LLC

June 3, 2014

To Whom It May Concern:

Capital Property Management, LLC is pleased to advise you that we are the new management company representing the owner, pursuant to a property management agreement, who has just purchased your property. We would be delighted to keep you as a tenant and would be happy to work with you to discuss some available options.

This letter is also serving as your "written notice" to vacate and surrender the property. Capital Property Management, LLC is the management company representing the new owner of the property and demands that you vacate the home.

If you desire to stay in your residence, we will have to submit the application to start the approval process to be able to sign a new lease. We will also be pleased to complete any repairs that affect the safety of you or the home. We look forward to establishing a long-standing relationship with you.

If you have not paid rent already, DO NOT PAY RENT TO YOUR PREVIOUS OWNER as they no longer own the property. We can provide documentation to show the property has new ownership and that we are now managing the property. These documents can be supplied to you for verification.

Please contact us and we will be pleased to provide all of the details and answer any questions you may have.

Thank you in advance for your prompt response.



Capital Property Management, LLC

1090 Northchase Pkwy Ste 300, Marietta, GA 30067

Phone: 678-401-5365

ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BEAULY, LLC
PLAINTIFF:

V.
TAKESHA DUNLAP AND ALL OTHER
OCCUPANTS
DEFENDANTS:

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Case No: **3-14CV-3785L**

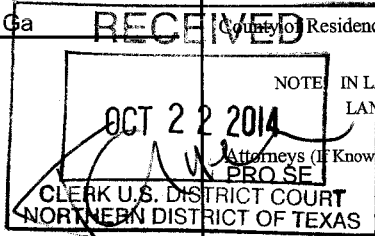
INDEX OF MATERIALS ATTACHED TO NOTICE OF REMOVAL

<u>No.</u>	<u>Date Filed or Entered</u>	<u>Document</u>
A.	10/22/2014	Index of materials Attached to Notice of Removal
B.	10/22/2014	Notice of Appeal
C.	10/22/2014	Original Petition
D.	10/22/2014	Notice of Appeal
E.	10/22/2014	Notice of Trial

JS 44 (Rev. 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS
BEAULY, LLCDEFENDANTS
TAKESHA DUNLAP AND ALL OCCUPANTS(b) County of Residence of First Listed Plaintiff Atlanta, Ga
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Defendant Tarrant County, Texas
(IN U.S. PLAINTIFF CASES ONLY)(c) Attorney's (Firm Name, Address, and Telephone Number)
BEAULY, LLC
P.O. BOX 13489
ATLANTA, GA 30324 770-609-1065

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|---------------------------------------|---|---------------------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input checked="" type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. §1332

Brief description of cause:

Plaintiff trying to take possession of property worth \$148,000

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION DEMAND \$
UNDER F.R.C.P. 23

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

10/22/2014

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____

AMOUNT _____

APPLYING IFP _____

JUDGE _____

MAG. JUDGE _____

